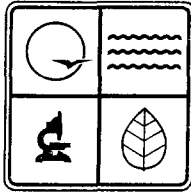


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION



PERMIT BOOK

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **01 2006 - 013**

Project Number: **2005-11-024**

Owner: **Visant Corporation**

Owner's Address: **One Byram Brook Place, Suite 202, Armonk, NY 10504**

Installation Name: **Von Hoffmann Corporation**

Installation Address: **1005 Commercial Drive, Owensville, MO 65066**

Location Information: **Gasconade County, S28, T42N, R5W**

Application for Authority to Construct was made for:

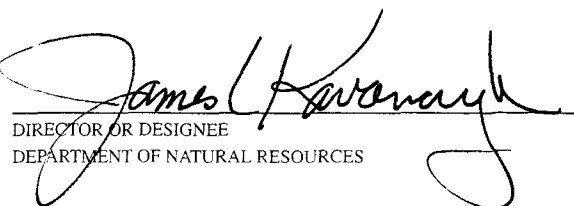
Installation of three (3) new heatset presses. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

☐ Standard Conditions (on reverse) are applicable to this permit.

☒ Standard Conditions (on reverse) and Special Conditions (listed as attachments starting on page 2) are applicable to this permit.

JAN 26 2006

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

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Permit No.	
Project No.	2005-11-024

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Von Hoffmann Corporation
Gasconade County, S28, T42N, R5W

1. **Superseding Condition**
The conditions of this permit supersede all special conditions found in the previously issued construction permit (Permit Number 022005-008) from the Air Pollution Control Program.
2. **Emission Limitation – Hazardous Air Pollutants**
 - A. Von Hoffmann Corporation shall emit less than ten (10) tons individually or twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the entire installation in any consecutive 12-month period.
 - B. Attachment A and Attachment B or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1(A). Von Hoffmann Corporation shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used at the installation.
 - C. Von Hoffmann Corporation shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2(B) indicate that the source exceeds the limitation of Special Conditions Number 2(A).
3. **Operational/Work Practices**
Von Hoffmann Corporation shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. Von Hoffmann Corporation shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.
4. **Shut Down of Equipment**

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Permit No.	
Project No.	2005-11-024

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

Von Hoffmann Corporation shall render inoperable the following emission units prior to start-up of the three new presses (EP-28, -29 and -30):

- A. EP-4 2-Unit Harris Heatset Web Press,
- B. EP-5 1-Unit Timson Heatset Web Press, and
- C. EP-23 2-Unit Harris Heatset Web Press.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (6) REVIEW

Project Number: 2005-11-024
Installation ID Number: 073-0008
Permit Number:

Von Hoffmann Corporation
1005 Commercial Drive
Owensville, MO 65066

Complete: November 15, 2005
Reviewed: January 13, 2006

Parent Company:
Visant Corporation
One Byram Brook Place, Suite 202
Armonk, NY 10504

Gasconade County, S28, T42N, R5W

REVIEW SUMMARY

- Von Hoffmann Corporation has applied for authority to construct three (3) new heatset presses.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are diethylene glycol monobutyl ether (DGME), propylene glycol ether, xylene and ethyl benzene.
- None of the New Source Performance Standards (NSPS) are applicable to this project. 40 CFR Part 60 Subpart QQ, *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing*, does not apply since this installation uses lithographic printing technique.
- None of the Maximum Achievable Control Technology (MACT) standards, listed in 40 CFR Part 63, apply to this project. 40 CFR Part 63 Subpart KK, *National Emission Standards for the Printing and Publishing Industry*, does not apply since this installation is not a major source of HAP emissions.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of volatile organic compounds (VOC) are above de minimis levels, but below the major source threshold.
- This installation is located in Gasconade County, an attainment area for all criteria air pollutants.

- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed for this review. No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions.
- Emissions testing is not required for the equipment.
- A Part 70 Operating Permit application is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Von Hoffmann Graphics, Incorporated operates lithographic presses, heatset and nonheatset web presses, and sheet-fed presses used in the production of printed material. With the completion of the last construction permit for this installation (Permit No. 022005-008), Von Hoffmann requested an installation-wide HAP emissions limitation on individual and combined HAPs. Von Hoffmann submitted an Intermediate Operating Permit application (Project No. 2001-07-110) requesting to be limited to less than 100 tons/year of VOC emissions. After the installation begins operation of the new equipment, they will have one year to submit a Part 70 Operating Permit application.

This installation was considered to be a major source of VOCs under construction permits based on existing potential emissions. However, actual emissions from the installation have never exceeded major source levels. A recalculation of the installation's existing potential emissions was conducted during this review, taking in to account several pieces of equipment that have been previously removed from the plant. The Harris Coldset Press (EP-1) has not been in use since September 2003; the unit was removed December 2004. The DG Press (EP-10) was removed in February 2004, and the Heidelberg Press (EP-14) was removed in September 2002. The following table contains a list of equipment currently at the plant.

Table 1: Summary of Existing Equipment

Emission Point ID No.	Description of Equipment	MHDR (tons/hr of ink)	Dryer Fuel Usage (MMCF/hr Nat Gas)
EP-4	Heatset Web Press w/ Nat. Gas Dryer	0.00383	0.0035
EP-5	Heatset Web Press w/ Nat. Gas Dryer	0.00383	0.0032
EP-6	Heatset Web Press w/ Nat. Gas/LPG Dryer	0.00383	0.0042 (0.0323 Mgal/hr LPG)
EP-7	Heatset Web Press w/ Nat. Gas/LPG Dryer	0.00383	0.0042 (0.0323 Mgal/hr LPG)
EP-8	Heatset Web Press w/ Nat. Gas/LPG Dryer	0.00383	0.0042 (0.0323 Mgal/hr LPG)
EP-23	Heatset Web Press w/ Nat. Gas Dryer	0.00383	0.0064
EP-24	Heatset Web Press w/ Nat. Gas/LPG Dryer	0.00383	0.0042 (0.0323 Mgal/hr LPG)
EP-25	Sheetfed Heidelberg Press	0.00166	
EP-26	Sheetfed Heidelberg Press	0.00166	
EP-27	Timson Heatset Web Press	0.00448	
EP-15	Natural Gas/LPG Boiler		0.0018 (0.02 Mgal/hr LPG)
EP-16	Natural Gas/LPG Boiler		0.0018 (0.02 Mgal/hr LPG)
EP-17	Cleanup Chemicals (all presses)	0.00339 (Mgal/hr)	
EP-18	Pre-Press Chemicals	0.00448 (Mgal/hr)	
EP-19	Plant Wide Chemicals	0.00036 (Mgal/hr)	

The following construction permits have been issued to Von Hoffmann Graphics, Inc. from the Air Pollution Control Program.

Table 2: Previously Issued Construction Permits

Permit	Project Description
0894-016	Installation of three (3) cold-set Harris Lithographic web presses, two (2) heat-set Harris lithographic web presses, three (3) heat-set Hantcho lithographic web presses, three (3) Heidelberg sheet-fed presses, and six (6) Didde Glaser cold-set forms web presses.
0195-007	Installation of six (6) Heidelberg sheet-fed printing presses.
0995-011	Amendment to the existing permits 0894-016 and 0195-017.
0797-013	Addition of one (1) heat-set lithographic web press and propane fired dryer.
0797-024	Addition of one (1) heat-set lithographic web press.
0797-024A	Amendment to permit No. 0797-024.
072000-013	Addition of a 4-unit Harris heat set lithographic web press and two (2) propane fired dryer.
092001-019	Addition of two (2) Heidelberg sheetfed presses with UV coaters and a Creo platemaker.
022005-008	Addition of a web press

Von Hoffmann has recently had another permitting action take place less than one year ago, and Von Hoffmann was questioned why they did not combine this project with that permitting activity, as one project. Von Hoffmann asserts that at the time the last press was being considered the plant was not considering any further additions. In fact, the plant was considering shut down early in the fall 2004. The equipment associated with this project is an attempt to prove the viability of the Owensville location. Although the

two projects have undergone New Source Review within one year's time, the two projects should not be considered together.

A Notice of Violation (NOV) No. 0683JC was issued to Von Hoffmann Graphics, Inc. on February 28, 2001, for failure to maintain records per construction Permit No. 0797-024. In addition, cleaning cloths used with cleanup solvents were not placed in tightly closed containers per Permit No. 0797-013, 0797-024, and 072000-013.

PROJECT DESCRIPTION

Von Hoffmann now proposes to install three additional heatset web presses. The presses are being moved from Von Hoffmann's Jefferson City facility. These presses will afford the Owensville location the ability to do 4-color printing; they have historically done 2-color printing only. The printers (EP-28, -29 and -30) each have a MHDR of 0.00533 tons of ink per hour. The natural gas dryers associated with the presses include a 7.32 million British Thermal units per hour (MMBTU/hr) unit (EP-28), a 7.2 MMBTU/hr unit (EP-29) and a 3.54 MMBTU/hr unit (EP-30), providing a total hourly fuel usage of 0.0172 million cubic feet per hour (MMCF/hr). Fountain solution will be used at a rate not to exceed 1.1 gallons per hour for the three new presses, according to the applicant. Blanket wash usage will be at a maximum rate of 0.5 gallons per hour. No air pollution control devices will be used in conjunction with the new equipment.

Along with the addition of the three presses, a few existing pieces of equipment will be removed as part of this project. Von Hoffmann plans on removing three heatset presses (EP-4, -5 and -23), along with their associated dryers. A special condition is included in this permit for the removal of these units. Von Hoffmann will not become a major source upon issuance of this permit, due to the removal of the three printers (EP-4, -5 and -23).

EMISSIONS/CONTROLS EVALUATION

Volatile organic compounds (VOC) are the main pollutants from this project. The potential emissions for this project were determined by mass balance computations derived from applicable Material Safety Data Sheets (MSDS) and information provided by the applicant. It is assumed that 20% of the VOCs contained in the inks for the heatset web presses is retained in the substrate, according to the Air Pollution Control Program's policy for heatset web offset lithographic printing.

Emissions from the combustion of fuel in the dryer were calculated using the emission factors obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 1.4, *Natural Gas Combustion* (07/1998), and Section 1.5, *Liquefied Petroleum Gas Combustion* (10/1996). The worst case scenario was used for each pollutant in determining potential emissions from combusting natural gas or propane. Existing potential emissions were recalculated during this review for all criteria pollutants except HAPs. Existing actual emissions were taken from the applicant's 2004 Emissions Inventory Questionnaire (EIQ) submittal. Potential emissions of the application represent the

potential of the new equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2004 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	1.11	0.11	0.57	N/A
SO _x	40.0	0.09	0.01	0.05	N/A
NO _x	40.0	19.78	1.47	7.53	N/A
VOC	40.0	200.84	83.02	63.42	N/A
CO	100.0	12.30	1.22	6.33	N/A
HAPs	10.0/25.0	10.0/25.0**	0.06	5.16	<10.0/25.0

N/A = Not Applicable; N/D = Not Determined

**Von Hoffmann was limited to less than 10.0 tpy of each individual HAP and 25.0 tpy of combined HAPs in Permit No. 022005-008. That limit is reinstated in this permit, inclusive of the new presses.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC are above de minimis levels, but below the major source threshold.

APPLICABLE REQUIREMENTS

Von Hoffmann Corporation shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170

- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

- *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*, 10 CSR 10-3.060

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Lina Klein
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated November 4, 2005, received November 7, 2005, designating Visant Corporation as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- St. Louis Regional Office Site Survey, dated November 18, 2005.
- MSDS provided by the applicant.

Attachment A - Monthly Combined HAPs Tracking Record

Von Hoffmann Corporation
Gasconade County, S28, T42N, R5W
Project Number: 2005-11-024
Installation ID Number: 073-0008
Permit Number:

This sheet covers the month of _____ in the year _____

Column 1	Column 2 (a)	Column 3	Column 4	Column 5
Material Used, (Name, HAP CAS #)	Amount of Material Used (Include Units)	Density (lbs/gal)	HAP Content (Weight %)	HAP Emissions (Tons)
(b) Total HAP Emissions Calculated for this Month in Tons:				
(c) 12-Month HAP Emissions Total from Previous Month's Attachment A in Tons:				
(d) Monthly HAP Emissions Total (b) from Previous Year's Attachment A in Tons:				
(e) Current 12-month Total of HAP Emissions in Tons: [(b) + (c) - (d)]				

Instructions: Choose appropriate HAP calculation method for units reported:

- (a) 1) If usage is in tons - $[\text{Column 2}] \times [\text{Column 4}] = [\text{Column 5}]$;
2) If usage is in pounds - $[\text{Column 2}] \times [\text{Column 4}] \times [0.0005] = [\text{Column 5}]$;
3) If usage is in gallons - $[\text{Column 2}] \times [\text{Column 3}] \times [\text{Column 4}] \times [0.0005] = [\text{Column 5}]$;
- (b) Summation of $[\text{Column 5}]$ in Tons;
- (c) 12-Month HAP emissions (e) from last month's Attachment A in Tons;
- (d) Monthly HAP emissions total (b) from the previous year's Attachment A in Tons;
- (e) Calculate the new 12-month combined HAPs emissions total. **A 12-Month HAP emissions total (e) of less than 25 tons indicates compliance.**

Attachment B: Monthly Individual HAPs Tracking Record

Von Hoffmann Corporation
Gasconade County, S28, T42N, R5W
Project Number: 2005-11-024
Installation ID Number: 073-0008
Permit Number:

HAP Name: _____ CAS No.: _____

This sheet covers the month of _____ in the year _____.

Column 1 (a)	Column 2 (b)
List materials from Attachment A which emit this specific HAP (Name, Type)	HAP emissions from Attachment A [Column 5] (in Tons)
(c) Total HAP Emissions Calculated for this Month, in Tons.	
(d) 12-Month HAP Emissions Total (f) from Previous Month's Attachment B, in Tons.	
(e) Monthly HAP Emissions Total (c) from Previous Year's Attachment B, in Tons.	
(f) Current 12-month Total of HAP Emissions in Tons: [(c) + (d) - (e)].	

Instructions: Choose appropriate HAP calculation method for units reported

- (a) Individually list each material that emits this specific HAP from this installation;
- (b) Record the amount of HAP emissions already calculated for Attachment A in [Column 5] in Tons;
- (c) Summation of [Column 2] in Tons;
- (d) Record the previous 12-Month individual HAP emission total (f) from last month's Attachment B, in Tons;
- (e) Record the monthly HAP emission total (c) from previous year's Attachment B, in Tons.
- (f) Calculate the new 12-month individual HAP emissions total. **A 12-Month individual HAP emissions total of less than ten (10.0) tons indicates compliance.**